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May 17, 2006

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VIA HAND DELIVERY

The Honorable Charles Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Intrastate Universal Service Fund Implementation Proceeding
Docket No.: 97-239-C

Dear Mr. Terreni:

Enclosed are the original and ten copies each of (1) Answer of Verizon Wireless to Petition of SCCTA and (2) Motion to Dismiss in Part or Stay the Petition of SCCTA, both of which are submitted for filing on behalf of Cellco Partnership d/b/a Verizon Wireless in the above matter. I would appreciate your acknowledging receipt of these documents by date-stamping the extra copy of this letter enclosed and returning it to me via the courier.

By copy of this letter, I am serving all parties of record with a copy of the Answer and Motion and have enclosed a certificate of service to that effect. If you have any questions, or need additional information, please do not hesitate to contact me. With best regards, I am

Sincerely,

WILLOUGHBY & HOEFER, P.A.



Benjamin P. Mustian

BPM/amw

cc: parties of record

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 97-239-C

Re: Intrastate Universal Service Fund)
 Implementation Proceeding) **CERTIFICATE OF SERVICE**
_____)

This is to certify that I have caused to be served this day one (1) copy of each (1) **Answer of Verizon Wireless to Petition of SCCTA** and (2) **Motion to Dismiss in Part or Stay the Petition of SCCTA** on behalf of Cellco Partnership d/b/a Verizon Wireless by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

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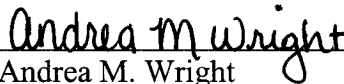
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Columbia, SC, 29211


Andrea M. Wright

Columbia, South Carolina
This 17th day of May, 2006

DOCKET NO. 1997-239-C

Intrastate Universal Service Fund

CELLCO Partnership, d/b/a Verizon Wireless (“Verizon Wireless”), an Intervenor and party of record in the above-captioned docket, by and through its undersigned counsel, pursuant to 26 S.C. Code Ann. Regs. R. 103-837 (1976) and the Public Service Commission of South Carolina’s (“Commission’s”) Notice dated April 13, 2006, answers the allegations contained in the Petition.

1. Each and every allegation of the Petition not hereinafter specifically admitted is denied.

2. The allegations of the first unnumbered Paragraph on page 1 bearing the heading “Introduction” does not appear to require a response from Verizon Wireless; however, to the extent that this paragraph can be read to require a response, same is denied, as Verizon Wireless lacks sufficient information to form a belief as to its truth or falsity.

3. As to the second unnumbered Paragraph on page 1 of the part of the Petition bearing the heading “Introduction”, Verizon Wireless is without sufficient information to form a belief as to the truth or falsity of the first sentence and the portion of the fifth sentence pertaining

to waiving issues on appeal and therefore denies same and demands strict proof. Verizon Wireless admits the second, third and fourth sentences of this paragraph upon information and belief. Verizon Wireless denies the remainder of the fifth sentence pertaining to SCCTA raising issues that are different from issues which are on appeal and asserts that the Petition pertains to issues which are before the Supreme Court pursuant to appeals by SCCTA of previous Orders of the Commission.

4. As to the third unnumbered Paragraph on page 2 of the part of the Petition bearing the heading "Introduction", the first sentence does not appear to require a response from Verizon Wireless; however, to the extent that this paragraph can be read to require a response, same is denied to the extent that it is inconsistent with the petition filed by ORS and Verizon Wireless craves reference to the petition filed by ORS for the meaning thereof and the relief sought thereby. Verizon Wireless denies the allegations of the second sentence of this paragraph and demands strict proof thereof. To the extent that any allegation in this paragraph remains unanswered, the same is denied as Verizon Wireless lacks sufficient information to form a belief as to their truth or falsity.

5. As to Paragraph 1, the allegations of the first sentence require no response and to the extent that such a response may be required, the same is denied. The second sentence is denied to the extent that it may be read to suggest that ORS has alleged that a circumstance exists which would justify action by the Commission to include wireless services in the State USF. The second sentence is admitted to the extent it alleges that ORS does not, by its petition, seek to raise the policy issue of whether wireless revenues should be assessed for purposes of the State USF. The third sentence does not appear to require any response from Verizon Wireless; to the extent it may be read to require a response, Verizon Wireless craves reference to the Legislative

Audit Council's February 2005 *Review of the South Carolina Universal Service Fund* ("LAC Report") cited by SCCTA and denies the allegation of this sentence to the extent that it may be inconsistent with that document. Verizon Wireless admits the first portion of the fourth sentence, but denies that the quoted portion reflects any ruling made by this Commission. Verizon Wireless is without sufficient information to form a belief as the truth or falsity of the fifth sentence and therefore denies same and demands strict proof thereof. Verizon Wireless denies the sixth sentence of this paragraph and, to the extent that it purports to quote, paraphrase or characterize certain sections of the LAC Report, the South Carolina Code, and/or other written documents, Verizon Wireless craves reference to same for its specific terms and import. To the extent that any allegations in this paragraph remain unanswered, the same is denied as respondents lack sufficient information or belief upon which to form an opinion as to their truth or falsity. The seventh sentence is denied except to the extent that it alleges a belief held by SCCTA and as to that Verizon Wireless lacks sufficient information to form a belief as to its truth or falsity.

6. Paragraph 2 appears to state conclusions of law which require no response and to the extent that such a response may be required, the same is denied. To the extent this paragraph seeks to quote, paraphrase or characterize certain sections of the South Carolina Code, Verizon Wireless would crave reference to those codified sections for their specific terms and import.

7. Paragraph 3 is denied as Verizon Wireless lacks sufficient information to form a belief as to its truth or falsity. To the extent this paragraph seeks to quote, paraphrase or characterize certain sections of the LAC Report, the South Carolina Code, orders of the Federal Communications Commission ("FCC") and/or other written documents, Verizon Wireless would crave reference to those codified sections for their specific terms and import.

8. Paragraph 4 is denied as Verizon Wireless lacks sufficient information to form a belief as to its truth or falsity. To the extent this paragraph seeks to quote, paraphrase or characterize certain reports, analyses or statements of the FCC and/or other written documents, Verizon Wireless would crave reference to those codified sections for their specific terms and import.

9. Paragraphs 5 and 6 appear to state conclusions of law which require no response and to the extent that such a response may be required, the same is denied. To the extent this paragraph seeks to quote, paraphrase or characterize certain sections of the South Carolina Code, Orders of the Commission and/or other written documents, Verizon Wireless would crave reference to those codified sections for their specific terms and import.

10. Verizon Wireless denies Paragraph 7 and would affirmatively show that determinations of this Commission under S.C. Code Ann. § 58-9-576(A) (Supp. 2005) are specifically excluded from consideration in any determination the Commission may be called upon to make under §58-9-280 (E)(3) or (G)(1). Further answering this paragraph of the SCCTA Petition, Verizon Wireless would show that the Commission is incapable of granting the relief requested in the last sentence because SCCTA has failed to specify the wireless providers, local exchange providers, customers, exchange(s) or defined geographic area required under S.C. Code Ann. §58-9-280(E) and (G). To the extent this paragraph otherwise seeks to quote, paraphrase or characterize certain sections of the South Carolina Code, certain orders of the Commission and/or other written documents, the respondents would crave reference to those orders or documents for their specific terms and import.

11. Verizon Wireless denies Paragraph 8 as Verizon Wireless lacks sufficient information to form a belief as to its truth or falsity. To the extent this paragraph seeks to quote,

paraphrase or characterize certain sections of the South Carolina Code, certain orders of the Commission and/or other written documents, the respondents would crave reference to those orders or documents for their specific terms and import.

12. Verizon Wireless denies Paragraph 9 as Verizon Wireless lacks sufficient information to form a belief as to its truth or falsity. To the extent this paragraph seeks to quote, paraphrase or characterize certain sections of the South Carolina Code, certain orders of the Commission and/or other written documents, the respondents would crave reference to those orders or documents for their specific terms and import.

FOR A FIRST AFFIRMATIVE DEFENSE

13. Pursuant to Rule 12(b)(8) SCRCF, SCCTA's Petition inappropriately raises issues which are currently the subject of another action pending between the same parties for the same claim and should be dismissed.

WHEREFORE, having fully set forth its answer to the SCCTA Petition, Verizon Wireless requests that the Commission issue an order (1) dismissing same for the reasons set for the above and in Verizon Wireless's motion to dismiss filed contemporaneously herewith, (2) denying the relief requested as it pertains to issue of the inclusion of wireless revenues in the State USF, and (3) that is consistent with the foregoing.

[SIGNATURE PAGE FOLLOWS]

Respectfully Submitted,

WILLOUGHBY & HOEFER, P.A.

By: 

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Columbia, South Carolina
This 17th day of May, 2006